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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

STATE OF ALASKA DEPARTMENT OF	)	
NATURAL RESOURCES, et al.,	)	
	)	<b>DISCLAIMER</b>
Plaintiffs,	)	
	)	Case No. 4:13-cv-00008-RRB
v.	)	
	)	
UNITED STATES OF AMERICA, et al.	)	
	)	
Defendants.	)	
_____	)	

COMES NOW the United States of America, by and through undersigned counsel,  
and, under 28 U.S.C. § 2409a(e), disclaims any interest adverse to the claims of the  
Plaintiffs, the State of Alaska Department of Natural Resources and the State of Alaska

Department of Transportation and Public Facilities, to highway rights-of-way established under 43 U.S.C. § 932 (“R.S. 2477”) along four trails known as the Chicken-to-Franklin Trail, the Franklin Creek Trail, the Hutchinson Creek Trail, and the Montana Creek Trail, asserted in Plaintiffs’ Amended Complaint in this action filed September 29, 2016, ECF No. 174, as amended in accordance with the right-of-way descriptions contained herein. All four above-described trails are located near Chicken, Alaska, on federal public lands within the Fortymile Wild and Scenic River Corridor.

#### Chicken-to-Franklin Trail

The legal description is as follows: a 60 foot wide strip of land within section 1, Township 27 North, Range 18 East, and within section 36, Township 28 North, Range 18 East; Copper River Meridian, Alaska, as located and described with the survey plat and field notes officially filed on March 21, 2023; said strip being 30 foot wide on either side of a centerline as described in the Informational Traverse of a Portion of the Apparent Centerline of the Chicken to Franklin Trail T. 27 N., R. 18 E., Copper River Meridian, Alaska portion of the field note record.

#### Franklin Creek Trail

The legal description is as follows: A 60 foot wide strip of land within sections 33 through 36, Township 28 North, Range 18 East, Copper River Meridian, Alaska; as located and described with the survey plat and field notes officially filed on March 21, 2023; said strip being 30 foot wide on either side of a centerline as described in the Informational Traverse of a Portion of the Apparent Centerline of the Chicken to Franklin Trail T. 28 N., R. 18 E., Copper River Meridian, Alaska portion of the field notice record.

#### Hutchinson Creek and Montana Creek Trails

The legal description is as follows: a 60 foot wide strip of land in Township 7 South, Range 27 East, Fairbanks Meridian, Alaska, as located and described with the survey plat and field notes officially filed on March 21, 2023; said strip being 30 foot wide on either side of the centerline as described in the Informational Traverse of the Apparent Centerlines of the Hutchinson Creek and Montana Creek Spur Trails, through a Portion of the Fortymile Wild and Scenic River Corridor

portion of the field note record.

This Disclaimer incorporates the terms of the Consent Decree and is conditioned upon the entry by the Court of the Consent Decree and Final Judgment as provided for in the concurrently-filed Motion for Entry of Consent Decree and Final Judgment among the Plaintiffs, the State of Alaska Department of Natural Resources and the State of Alaska Department of Transportation and Public Facilities, and Federal Defendant, United States of America.

Respectfully submitted this 20th day of November 2024.

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/s/ Krystal-Rose Perez  
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